

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

---

JEFFREY FRANZ, et al.,

Plaintiffs,

Case No. 21-cv-12871

HON. MARK A. GOLDSMITH

Vs.

OXFORD COMMUNITY SCHOOL DISTRICT, et al.,

Defendants.

---

**EXHIBIT 1 TO PLAINTIFFS' *EX-PARTE* MOTION TO PRESERVE AND  
RESTORE EVIDENCE**

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

19390 WEST TEN MILE ROAD

SOUTHFIELD, MICHIGAN 48075-2463

TELEPHONE (248) 355-5555

FAX (248) 355-5148

WEBSITE: [www.fiegerlaw.com](http://www.fiegerlaw.com)

NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Abbey Ridge Apartment Homes

Attn: Complex Manager

211 Market Street

Oxford, MI 48371

Abbey Ridge Apartment Homes

Attn: Peter K Burton

30100 Telegraph Road

Suite 366

Bingham Farms, MI 48025

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any video and audio recordings of the incident and/or the incident scene following the incident;

- Any video and audio recordings of the students and families entering, exiting, the complex or in the parking lot of the complex;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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DIRECT DIAL (248) 945-7519

E-MAIL: n.hanna@fiergelaw.com

December 10, 2021

***DEMAND TO PRESERVE EVIDENCE***

**VIA FIRST-CLASS AND CERTIFIED MAIL**

AT&T Wireless  
11760 US Highway 1  
Ste. 600  
North Palm Beach FL 22408

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Ethan Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Jennifer Crumbley;

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Jennifer Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with James Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Steven Wolf;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Melissa Williams;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Tim Throne;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Angela Waver;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Ethan Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Jennifer Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to James Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Steven Wolf;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Melissa Williams;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Tim Throne;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Angela Waver;
- Any and all messages to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;

- Any and all messages to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all video, photos, posts, or messages from Ethan Crumbley;
- Any and all video, photos, posts, or messages from Jennifer Crumbley;
- Any and all video, photos, posts, or messages from James Crumbley;
- Any and all video, photos, posts, or messages from Steven Wolf;
- Any and all video, photos, posts, or messages from Melissa Williams;

- Any and all video, photos, posts, or messages from Tim Throne;
- Any and all video, photos, posts, or messages from Angela Waver;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Ethan Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Jennifer Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding James Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Steven Wolf;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Melissa Williams;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Tim Throne;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Angela Waver;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

A handwritten signature in blue ink, appearing to read 'Nora Y. Hanna', with a long horizontal flourish extending to the right.

Nora Y. Hanna, Esq.

NYH/



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December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Facebook

Attn: Records and Account Preservation/Legal

1601 Willow Road

Menlo Park CA 94025

**Re: *Oxford High School Shooting***  
***Our file No.: 22213***  
***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Jennifer Crumbley;
- Any and all handles, accounts, and profiles which belong to James Crumbley;
- Any and all handles, accounts, and profiles which belong to Timothy Throne;



- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;

- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

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Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

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December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Federal Bureau of Investigations

Attention: Records

477 Michigan Avenue

26th Floor

Detroit, MI 48226

[detroit.fbi.gov](http://detroit.fbi.gov)

Federal Bureau of Investigations

Attention: Records

935 Pennsylvania Avenue, NW

Washington, D.C. 20535-0001

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;

- Full and complete file on Jennifer Crumbley;
- Full and complete file on James Crumbley;
- Any and all charge paperwork and supporting documents;
- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all video footage maintained and/or obtained by you from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos obtained from your recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, and/or the students affected by the Oxford School Shooting occurring on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;

- Any and all photographs maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence a Ethan Crumbley or one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or

incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding the incident which occurred on November 30, 2021;

- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;
- Any and all student counseling and/or social worker and/or therapy records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- If the subject firearm used in the Oxford High School shooting is no longer in your possession and/or accessible, please preserve any and all documentation, receipts, files, memoranda, and records in your possession demonstrating transfer of ownership and/or destruction of the same;
- Any and all metadata and electronically stored information maintained and/or obtained by you posted on social media platforms, including, but not limited to Facebook, Instagram, Twitter, Youtube, Tik Tok, and Snap Chat;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;



- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all CAD or run sheets generated relative to the subject incident;
- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
- Any and all calls, text messages, or communications to dispatch relating to the subjecting incident which occurred on November 30, 2021;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;



- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

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December 10, 2021

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Instagram

Attn: Records and Account Preservation/Legal

1601 Willow Road

Menlo Park CA 94025

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

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**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Jennifer Crumbley;
- Any and all handles, accounts, and profiles which belong to James Crumbley;
- Any and all handles, accounts, and profiles which belong to Timothy Throne;

- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;

- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW  
19390 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075-2463

TELEPHONE (248) 355-5555

FAX (248) 355-5148

WEBSITE: www.fiegerlaw.com

NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: n.hanna@fiiegerlaw.com

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

LinkedIn

Attn: Records and Account Preservation/Legal  
1000 West Maude Avenue  
Sunnyvale, CA 94085

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Jennifer Crumbley;
- Any and all handles, accounts, and profiles which belong to James Crumbley;

- Any and all handles, accounts, and profiles which belong to Timothy Throne;
- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;

- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

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**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

  
Nora Y. Hanna, Esq.



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E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Meijer Store  
Attn: Store Manager  
900 N. Lapeer Road  
Oxford, MI 48371

Meijer, Inc  
The Corporation Company  
40600 Ann Arbor Road E  
Suite 201  
Plymouth, MI

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any video and audio recordings of the incident and/or the incident scene following the incident;

- Any video and audio recordings of the students and families entering, exiting, the Meijer Store or in the parking lot of the Meijer Store;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

A handwritten signature in blue ink, appearing to read 'Nora Y. Hanna'.

Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

DEPARTMENT OF ATTORNEY GENERAL

Attn: Records

G. Mennen Williams Building

525 W. Ottawa Street

P.O. Box 30212

Lansing, MI 48909

DEPARTMENT OF ATTORNEY GENERAL

Attn: Records

Cadillac Place

10th Floor

3030 W. Grand Blvd.

Ste 10-200

Detroit, MI 48202

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Full and complete file on Jennifer Crumbley;
- Full and complete file on James Crumbley;
- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all video footage maintained and/or obtained by you from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos obtained from your recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, and/or the students affected by the Oxford School Shooting occurring on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;

- Any and all photographs maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence a Ethan Crumbley or one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or

incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding the incident which occurred on November 30, 2021;

- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;
- Any and all student counseling and/or social worker and/or therapy records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- If the subject firearm used in the Oxford High School shooting is no longer in your possession and/or accessible, please preserve any and all documentation, receipts, files, memoranda, and records in your possession demonstrating transfer of ownership and/or destruction of the same;
- Any and all metadata and electronically stored information maintained and/or obtained by you posted on social media platforms, including, but not limited to Facebook, Instagram, Twitter, Youtube, Tik Tok, and Snap Chat;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;



- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all CAD or run sheets generated relative to the subject incident;
- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
- Any and all calls, text messages, or communications to dispatch relating to the subjecting incident which occurred on November 30, 2021;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;
- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;



- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

I respectfully request that you do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please forward this correspondence to your insurance company. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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NORA Y. HANNA

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E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Michigan State Police

Attn: Records

P.O. Box 30634

Lansing, Michigan 48909

Michigan State Police Metro Post North

Attn: Records

14350 10 Mile Road

Oak Park, MI 48237

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Full and complete file on Jennifer Crumbley;
- Full and complete file on James Crumbley;

- Any and all charge paperwork and supporting documents;
- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all video footage maintained and/or obtained by you from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos obtained from your recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, and/or the students affected by the Oxford School Shooting occurring on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all photographs maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;

- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence a Ethan Crumbley or one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding the incident which occurred on November 30, 2021;

- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;
- Any and all student counseling and/or social worker and/or therapy records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- If the subject firearm used in the Oxford High School shooting is no longer in your possession and/or accessible, please preserve any and all documentation, receipts, files, memoranda, and records in your possession demonstrating transfer of ownership and/or destruction of the same;
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- Any Social Media download or data obtained from the cell phone of James Crumbley;

- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;
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- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
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- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
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- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
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- Any and all footage, records, photographs, or reports obtained from any news agency or source;

- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

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Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH



**FIEGER, FIEGER, KENNEY & HARRINGTON**

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ATTORNEYS AND COUNSELORS AT LAW

19390 WEST TEN MILE ROAD

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Oakland County Emergency Communications and Operations Divisions

Attn: Records

1200 N Telegraph Road

Bldg 38E

Pontiac, MI 48341

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;

- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all CAD or run sheets generated relative to the subject incident;
- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
- Any and all calls, text messages, or communications to dispatch relating to the subjecting incident which occurred on November 30, 2021;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

19390 WEST TEN MILE ROAD

SOUTHFIELD, MICHIGAN 48075-2463

TELEPHONE (248) 355-5555

FAX (248) 355-5148

WEBSITE: [www.fiegerlaw.com](http://www.fiegerlaw.com)

NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Oakland County Prosecutor

Attn: Records

1200 N Telegraph Road

Bldg 38E

Pontiac, MI 48341

[prosecutor@oakgov.com](mailto:prosecutor@oakgov.com)

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

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**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Full and complete file on Jennifer Crumbley;
- Full and complete file on James Crumbley;

- Any and all charge paperwork and supporting documents;
- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all video footage maintained and/or obtained by you from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos obtained from your recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, and/or the students affected by the Oxford School Shooting occurring on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all photographs maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;

- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
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- Any and all social media posts maintained and/or obtained by you regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
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- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;
- Any and all student counseling and/or social worker and/or therapy records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- If the subject firearm used in the Oxford High School shooting is no longer in your possession and/or accessible, please preserve any and all documentation, receipts, files, memoranda, and records in your possession demonstrating transfer of ownership and/or destruction of the same;
- Any and all metadata and electronically stored information maintained and/or obtained by you posted on social media platforms, including, but not limited to Facebook, Instagram, Twitter, Youtube, Tik Tok, and Snap Chat;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;



- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
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- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
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Nora Y. Hanna, Esq.

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December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Oakland County Sheriff's Office

Attn: Records

1200 N Telegraph Road

Bldg 38E

Pontiac, MI 48341

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

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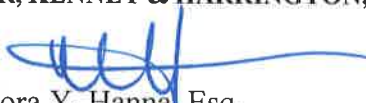


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**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna Esq.

NYH/ss

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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NORA Y. HANNA

December 10, 2021

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Snapchat

Attn: Records and Account Preservation/Legal

Snap Inc.

2772 Donald Douglas Loop North

Santa Monica, CA 90405

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

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**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Jennifer Crumbley;
- Any and all handles, accounts, and profiles which belong to James Crumbley;
- Any and all handles, accounts, and profiles which belong to Timothy Throne;

- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
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- Any Social Media download or data obtained from the cell phone of James Crumbley;

- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
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Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

A handwritten signature in blue ink, appearing to read 'Nora Y. Hanna', with a long horizontal flourish extending to the right.

Nora Y. Hanna, Esq.

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

TikTok Inc.

Attn: Records and Account Preservation/Legal

5800 Bristol Parkway, Suite 100

Culver City, CA 90230

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

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- Any and all handles, accounts, and profiles which belong to Timothy Throne;
- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;

- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

19390 WEST TEN MILE ROAD

SOUTHFIELD, MICHIGAN 48075-2463

TELEPHONE (248) 355-5555

FAX (248) 355-5148

WEBSITE: www.fiegerlaw.com

NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: n.hanna@fiergelaw.com

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Tim Horton's Café and Bake Shop

Attn: Store Manager

590 N. Lapeer Road

Oxford, MI 48371

Tim Hortons USA, Inc.

The Corporation Company

40600 Ann Arbor Road E

Suite 201

Plymouth, MI

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any video and audio recordings of the incident and/or the incident scene following the incident;

- Any video and audio recordings of the students and families entering, exiting, the Tim Horton's Café or in the parking lot of the Tim Horton's Café ;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

A handwritten signature in blue ink, appearing to read 'Nora Y. Hanna', with a long horizontal flourish extending to the right.

Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW  
19390 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075-2463

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL AND E-MAIL**

Oxford Community School District  
c/o Timothy J. Mullins  
Giarmarco, Mullins & Horton, P.C.  
Tenth Floor Columbia Center  
101 West Big Beaver Road  
Troy, Michigan 48084-5280  
[tmullins@gmhlaw.com](mailto:tmullins@gmhlaw.com)  
[ebinno@gmhlaw.com](mailto:ebinno@gmhlaw.com)

***Re: Oxford High School Shooting***

***Our file No.: 22213***

***Date of incident: November 30, 2021***

Mr. Mullins:

As you are aware we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file, permanent record, writings, drawings, notes, and other on other information on Ethan Crumbley;
- Full preservation of any and all recordings whether the means is videography, photographic, or audio located inside or outside Oxford High School from November 1, 2021 through the date of this writing;

- Full preservation of any and all recordings whether the means is videography, photographic, or audio located inside or outside Oxford High School from November 1, 2021 through the date of this writing depicting Ethan Crumbley;
- Full preservation of any and all recordings whether the means is videography, photographic, or audio located inside or outside Oxford High School from November 1, 2021 through the date of this writing depicting Jennifer Crumbley;
- Full preservation of any and all recordings whether the means is videography, photographic, or audio located inside or outside Oxford High School from November 1, 2021 through the date of this writing depicting James Crumbley;
- Full preservation of any and all recordings whether the means is videography, photographic, or audio located inside or outside Oxford High School from November 1, 2021 regarding Ethan Crumbley;
- Any video and audio recordings of the incident and/or the incident scene following the incident;
- Any and all video footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from any social media platform, including, but not



limited to: Tik Tok, LinkedIn, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;

- Any and all profiles, handles, messages, and accounts maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from any social media platform, including, but not limited to: Tik Tok, LinkedIn, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Full preservation of any and all handles, profiles, and account maintained you, a Defendant, or any agent of Oxford Community School District from November 1, 2021, to the present and ongoing.
- Full restoration of any and all handles, profiles, and account maintained you, a Defendant, or any agent of Oxford Community School District from November 1, 2021, to the present and ongoing.
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos, photographs, or audio obtained from you, a Defendant, or any agent of Oxford Community School District recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, Jennifer Crumbley, James Crumbley and/or the students at Oxford School on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all photographs maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District from any social media platform, including, but not limited to: Tik Tok, LinkedIn, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021, either sent to or received from you, a Defendant, or any agent of Oxford Community School District;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021, either sent to or received from you, a Defendant, or any agent of Oxford Community School District;

- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021, either sent to or received from you, a Defendant, or any agent of Oxford Community School District;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021, either sent to or received from you, a Defendant, or any agent of Oxford Community School District;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District regarding reports of threatened violence by Ethan Crumbley or one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you, a Defendant, or any agent of Oxford Community School District and/or obtained by you, a Defendant, or any agent of Oxford Community School District and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you, a Defendant, or any agent of Oxford Community School District and/or obtained by you, a Defendant, or any agent of Oxford Community School District and/or any of your agents or employees and/or anyone working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all employment records of agents and/or employees of Oxford Community School District;

- Any and all employment records of counselors at Oxford High School;
- Any and all employment records of teachers at Oxford High School;
- Any and all employment records of staff members at Oxford High School;
- Any and all school recommendations, actions, discipline, or warnings issued to or on behalf of Ethan Crumbley;
- Any and all emails to and from parents of Oxford High School students with safety concerns from January 1, 2021, to November 30, 2021;
- Any and all letters drafted and/or sent to parents of Oxford High School students regarding safety concerns;
- Any and all letters, reports, emails, or communications regarding the concerns or safety surrounding Ethan Crumbley;
- Any and all letters or emails to and from Stacey Scheidt and Principal Steven Wolf;
- Any and all letters or emails to and from any Oxford High School and Principal Steven Wolf regarding safety concerns from September 2021 through the date of this writing;
- Any and all letters or emails to and from any Oxford High School and Principal Steven Wolf regarding safety concerns from September 2021 through the date of this writing;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;
- Any and all student counseling records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you, a Defendant, or any agent of Oxford Community School District and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you, a Defendant, or any agent of Oxford Community School District and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;

- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you, a Defendant, or any agent of Oxford Community School District posted on social media platforms, including, but not limited to Facebook, Instagram, LinkedIn, Twitter, Youtube, Tik Tok, and Snap Chat;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;
- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- The contents of the locker belonging to Ethan Crumbley;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;
- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;

- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you, a Defendant, or any agent of Oxford Community School District and/or any agent and/or employee working on your behalf;
- Any and all CAD or run sheets generated relative to the subject incident;
- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
- Any and all calls, text messages, or communications to dispatch relating to the subjecting incident which occurred on November 30, 2021;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Code of Conduct in effect in 2021 and on the date of incident for Oxford High School;
- Code of Conduct in effect in 2021 and on the date of incident for Oxford Community Schools;
- Student handbook in effect in 2021 and on the date of incident for Oxford High School;
- Oxford High School disciplinary policy in effect in 2021 and on the date of incident;
- Full and complete employee files on:
  - Timothy Throne
  - Steven Wolf
  - Ryan Moore
  - Dean of students for 2021 school year
  - Nicholas Ejak
  - All counselors involved in counseling Ethan Crumbley
  - All teachers of Ethan Crumbley
  - Melissa Williams
  - Angela Weaver
- Any and all employees handbooks for:

- Timothy Throne
  - Steven Wolf
  - Ryan Moore
  - Dean of students for 2021 school year
  - Nicholas Ejak
  - All counselors involved in counseling Ethan Crumbley
  - All teachers of Ethan Crumbley
  - Melissa Williams
  - Angela Weaver
- Full and complete training materials for or supplied to:
  - Timothy Throne
  - Steven Wolf
  - Ryan Moore
  - Dean of students for 2021 school year
  - Nicholas Ejak
  - All counselors involved in counseling Ethan Crumbley
  - All teachers of Ethan Crumbley
  - Melissa Williams
  - Angela Weaver
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with you.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.



**FIEGER, FIEGER, KENNEY & HARRINGTON**

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

***DEMAND TO PRESERVE EVIDENCE***

**VIA FIRST-CLASS AND CERTIFIED MAIL**

T-Mobile/ Metro PCS  
4 Sylvan Way  
Parisppay, NJ 07054

**Re: *Oxford High School Shooting***  
***Our file No.: 22213***  
***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Ethan Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Jennifer Crumbley;

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Jennifer Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with James Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Steven Wolf;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Melissa Williams;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Tim Throne;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Angela Waver;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Ethan Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Jennifer Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to James Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Steven Wolf;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Melissa Williams;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Tim Throne;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Angela Waver;
- Any and all messages to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;

- Any and all messages to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all video, photos, posts, or messages from Ethan Crumbley;
- Any and all video, photos, posts, or messages from Jennifer Crumbley;
- Any and all video, photos, posts, or messages from James Crumbley;
- Any and all video, photos, posts, or messages from Steven Wolf;
- Any and all video, photos, posts, or messages from Melissa Williams;

- Any and all video, photos, posts, or messages from Tim Throne;
- Any and all video, photos, posts, or messages from Angela Waver;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Ethan Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Jennifer Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding James Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Steven Wolf;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Melissa Williams;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Tim Throne;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Angela Waver;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH/

**FIEGER, FIEGER, KENNEY & HARRINGTON**

A PROFESSIONAL CORPORATION

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SOUTHFIELD, MICHIGAN 48075-2463

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

U.S. Department of Justice

Attention: Records

950 Pennsylvania Avenue, NW

Washington, DC 20530-00011

**Re: *Oxford High School Shooting***  
***Our file No.: 22213***  
***Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Full and complete file on Jennifer Crumbley;
- Full and complete file on James Crumbley;
- Any and all charge paperwork and supporting documents;
- Any video and audio recordings of the incident and/or the incident scene following the incident;

- Any and all video footage maintained and/or obtained by you from Oxford High School regarding the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you regarding the incident on November 30, 2021, from:
  - Meijer located at 900 N. Lapeer Rd., Oxford, MI 48371;
  - Abbey Ridge Apartment Homes located at 211 Market Street, Oxford, MI 48371; and
  - Tim Horton's located at 590 N. Lapeer Rd., Oxford, MI 48371;
- Any and all video footage maintained and/or obtained by you from any local business and/or residential property showing the vicinity of Oxford High School and/or the students at Oxford High School and/or EMS or Police arriving to Oxford High School on November 30, 2021, relating to the incident on November 30, 2021;
- Any and all video footage maintained and/or obtained by you from the students and/or staff of Oxford High School;
- Any and all video footage maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Youtube, Apple and/or Android video streaming applications;
- Any and all video footage including, but not limited to, body cam and dash cam footage maintained and/or obtained by you from any law enforcement agency relating to the incident occurring on November 30, 2021;
- Any and all videos obtained from your recording/surveillance equipment;
- Any and all photographs of the subject scene, Ethan Crumbley, and/or the students affected by the Oxford School Shooting occurring on November 30, 2021, which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all photographs maintained and/or obtained by you from any social media platform, including, but not limited to: Tik Tok, Facebook, Instagram, Whatsapp, Viber, Zoom, Apple and/or Android photo streaming applications;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence against Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;



- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence at the Oxford High School for one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, regarding possible and/or potential threats reported by students, parents, and/or community members regarding potential threats of violence by Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all correspondence including, but not limited to, letters, emails, and social media direct messages, relating to any school official response to potential reports of threatened violence Ethan Crumbley for one (1) year preceding the Oxford High School shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding reports of threatened violence a Ethan Crumbley or one (1) year preceding the Oxford School Shooting occurring on November 30, 2021;
- Any and all social media posts maintained and/or obtained by you regarding the subject incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding incident which occurred on November 30, 2021;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated by you and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all employment records of agents and/or employees of Oxford High School;
- Any and all student profiles and records of students registered at Oxford High School on November 30, 2021;

- Any and all student counseling and/or social worker and/or therapy records of students registered at Oxford High School on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf regarding the incident which occurred on November 30, 2021;
- Any and all tangible things believed to be in any way, shape or form directly or indirectly related to the Oxford School Shooting and/or threats of violence at the Oxford High School for one (1) year preceding the incident which occurred on November 30, 2021;
- The subject firearm that was discharged by Ethan Crumbley;
- Any and all magazines, and/or bullets collected from the subject firearm that was discharged by Ethan Crumbley;
- If the subject firearm used in the Oxford High School shooting is no longer in your possession and/or accessible, please preserve any and all documentation, receipts, files, memoranda, and records in your possession demonstrating transfer of ownership and/or destruction of the same;
- Any and all metadata and electronically stored information maintained and/or obtained by you posted on social media platforms, including, but not limited to Facebook, Instagram, Twitter, Youtube, Tik Tok, and Snap Chat;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;
- Any Social Media download or data obtained from the cell phone of James Crumbley;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all documents, photos, videos, and evidence produced to and/or submitted to the Oakland County Sheriff's Department, and/or any local/state/federal investigative agency charged with investigating the incident which occurred on November 30, 2021;

- Any and all photographs of the subject incident, involved witnesses to the subject incident which were taken at any time on the date of the subject incident and/or at any time after the subject incident;
- Any and all audio recordings (including but not limited to audio recordings of all phone calls to and from the police station and shift commander phones) which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all 911 recordings pertaining to the subject incident which you and/or any of your agents or employees have obtained relative to the subject occurrence;
- Any and all files, file folders, memorandum, investigation record(s), investigation reports, complaints, witness statements, notes, photographs, drawings, diagrams and/or incident reports generated and/or obtained by you and/or any of your agents or employees and/or anyone working on your behalf;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all recorded statements obtained by you and/or any agent and/or employee working on your behalf;
- Any and all CAD or run sheets generated relative to the subject incident;
- Any and all CAD or run sheets generated relative to Ethan Crumbley;
- Any and all CAD or run sheets generated relative Oxford High School;
- Any and all calls, text messages, or communications to dispatch relating to the subjecting incident which occurred on November 30, 2021;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all drawings, texts, letters, or correspondence created by Ethan Crumbley;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the

corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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ATTORNEYS AND COUNSELORS AT LAW

19390 WEST TEN MILE ROAD

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: [n.hanna@fiiegerlaw.com](mailto:n.hanna@fiiegerlaw.com)

December 10, 2021

***DEMAND TO PRESERVE EVIDENCE***

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Verizon

Attn: VSAT (Verizon Security Assistance Team)

Attn: Records

180 Washington Valley Road

Bedminster, NJ 07921

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Ethan Crumbley;

- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Jennifer Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with James Crumbley;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Steven Wolf;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Melissa Williams;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Tim Throne;
- Any and all information, cell numbers, data accounts, cloud accounts, or text accounts associated with Angela Waver;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Ethan Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Jennifer Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to James Crumbley;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Steven Wolf;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Melissa Williams;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Tim Throne;
- Any and all cell phone numbers, texts, data logs, phone calls, videos, photographs, cloud data, phone logs, and records which belong to Angela Waver;
- Any and all messages to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;




- Any and all messages to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all messages to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Ethan Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Jennifer Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from James Crumbley from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Steven Wolf from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Melissa Williams from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Tim Throne from November 1, 2021, to November 30, 2021;
- Any and all phone calls to and from Angela Waver from November 1, 2021, to November 30, 2021;
- Any and all video, photos, posts, or messages from Ethan Crumbley;
- Any and all video, photos, posts, or messages from Jennifer Crumbley;
- Any and all video, photos, posts, or messages from James Crumbley;
- Any and all video, photos, posts, or messages from Steven Wolf;
- Any and all video, photos, posts, or messages from Melissa Williams;

- Any and all video, photos, posts, or messages from Tim Throne;
- Any and all video, photos, posts, or messages from Angela Waver;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Ethan Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Jennifer Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding James Crumbley;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Steven Wolf;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Melissa Williams;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Tim Throne;
- Any and all metadata and electronically stored information maintained and/or obtained by you regarding Angela Waver;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**



Nora Y. Hanna, Esq.

NYH/

**FIEGER, FIEGER, KENNEY & HARRINGTON**

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NORA Y. HANNA

DIRECT DIAL (248) 945-7519

E-MAIL: n.hanna@fierlaw.com

December 10, 2021

**VIA FIRST-CLASS AND CERTIFIED MAIL**

Youtube

Attn: Records and Account Preservation/Legal

901 Cherry Ave.

San Bruno, CA 94066

***Re: Oxford High School Shooting  
Our file No.: 22213  
Date of incident: November 30, 2021***

TO WHOM IT MAY CONCERN:

Please be advised that we have been retained to represent the interests of a victim involved in the incident occurring at Oxford High School on November 30, 2021. Be advised that you are requested to produce and preserve all potential evidence relating to the Oxford High School Shooting which occurred on November 30, 2021. This writing serves as notice that this firm demands that you ensure that no one destroys, alters, discards, or otherwise disposes of any potential evidence relevant to the subject occurrence. **Additionally, you are requested to produce potential evidence to our office by December 28, 2021.**

I respectfully request that you provide to our office and retain all information, documentation and/or evidence, no matter in what form, now or at any time in your possession, relating to, in any way, shape or form, the subject incident. This request includes, but is not limited to the following:

**DEMAND FOR PRODUCTION AND PRESERVATION**

- Full and complete file on Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Ethan Crumbley;
- Any and all handles, accounts, and profiles which belong to Jennifer Crumbley;
- Any and all handles, accounts, and profiles which belong to James Crumbley;
- Any and all handles, accounts, and profiles which belong to Timothy Throne;

- Any and all handles, accounts, and profiles which belong to Steven Wolf;
- Any and all handles, accounts, and profiles which belong to Ryan Moore;
- Any and all handles, accounts, and profiles which belong to Nicholas Ejak;
- Any and all handles, accounts, and profiles which belong to Melissa Williams;
- Any and all handles, accounts, and profiles which belong to Angela Weaver;
- Any and all stories or posts with the hashtag of #OxfordStrong on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordSchoolShooting on November 30, 2021;
- Any and all stories or posts with the hashtag of #OxfordShooting; on November 30, 2021;
- Any and all stories or posts with the hashtag of #SchoolShooting; on November 30, 2021;
- Any and all messages to and from Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all video, photos, posts, or messages that depict Ethan Crumbley;
- Any and all stories, posts, videos, photographs, or messages maintained by you which was posted, sent, or shared at the location of Oxford High School, 745 N Oxford Rd, Oxford, MI 48371, on November 30, 2021;
- Any and all metadata and electronically stored information maintained and/or obtained by you;
- Any cell phone download or data obtained from the cell phone of Ethan Crumbley;
- Any cell phone download or data obtained from the cell phone of Jennifer Crumbley;
- Any cell phone download or data obtained from the cell phone of James Crumbley;
- Any Social Media download or data obtained from the cell phone of Ethan Crumbley;
- Any Social Media download or data obtained from the cell phone of Jennifer Crumbley;
- Any Social Media download or data obtained from the cell phone of James Crumbley;

- Any and all messages, posts, stories, letters, or correspondence created by Ethan Crumbley from November 30, 2020, to November 30, 2021;
- Any and all tangible evidence related to or relevant to the subject incident;
- Any and all calls, text messages, or communications to dispatch relating Ethan Crumbley in 2021;
- Any and all footage, records, photographs, or reports obtained from any news agency or source;
- Any and all evidence believed to be in any way, shape or form directly or indirectly related to the subject incident.

Do not destroy any of the foregoing documents, recordings and/or evidence. You should not defer preservation steps if information or recordings may be lost or corrupted as a consequence of delay. Should your failure to preserve potentially relevant evidence result in the corruption, loss, or delay in production of evidence to which we are entitled, such failure would constitute spoliation of evidence, and we will not hesitate to seek sanctions.

Please contact my office upon receipt of this letter to ensure the safeguards and measures you have taken to preserve this evidence. If you have legal counsel, I welcome the opportunity to discuss this demand for the preservation and request for production of evidence with them.

Very truly yours,  
**FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.**

A handwritten signature in blue ink, appearing to read 'Nora Y. Hanna', with a stylized, flowing script.

Nora Y. Hanna, Esq.